

UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE: :  
PAUL R. CASTNER, :  
DEBTOR, : CASE NO. 18-21827-GLT  
RONDA J. WINNECOUR, CHAPTER 13 : CHAPTER 13  
TRUSTEE, : DOCUMENT NO. 118  
MOVANT, :  
VS. :  
PAUL R. CASTNER, :  
RESPONDENTS. :  
:

**DEBTOR'S DECLARATION IN RESPONSE TO**  
**NOTICE OF MORTGAGE PAYMENT CHANGE**

I, Louis Pomerico, Esquire, counsel for the Debtor, hereby confirm that I have reviewed the Notice of Mortgage Payment Change, which reflects an increase to the escrow mortgage payment. As Debtor's Plan is sufficiently funded to cover this payment, no amended plan will be necessary. Accordingly, I hereby consent to the new post petition payment (escrow) to NewRez LLC d/b/a Shellpoint Mortgage Servicing effective June 1, 2023, in the amount of \$562.84 per month, from the current payment of \$516.32, per the Notice dated April 12, 2023.

Dated: May 9, 2023

/s/ Louis Pomerico, Esquire

Louis Pomerico, Esquire  
PA. I.D. NO. 22855  
Attorney for Debtor  
2910 Wilmington Road  
New Castle, PA 16105  
(724) 658-7759  
info@pomericolaw.com